

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
(Richmond Division)**

**UNITED STATES OF AMERICA**

**v.**

**KOLON INDUSTRIES, INC.,**

Including and through its successors  
“Kolon Industries, Inc.” and “Kolon  
Corporation”

**JONG-HYUN CHOI,**

**IN-SIK HAN,**

**JU-WAN KIM,**

**KYEONG-HWAN RHO,**

**YOUNG-SOO SEO,**

**Defendants.**

**Case No. 3:12-cr-137**

**MOTION FOR LEAVE TO ENTER LIMITED AND SPECIAL APPEARANCES  
ON BEHALF OF KOLON INDUSTRIES, INC.**

Jeff G. Randall (*pro hac vice* pending)

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*Attorneys for Specially-Appearing Defendant  
Kolon Industries, Inc.*

PLEASE TAKE NOTICE that counsel for Kolon Industries, Inc. (“Kolon”)<sup>1</sup> hereby seek leave of the Court to appear specially on Kolon’s behalf to file a motion to quash the purported service of the summons and to dismiss the Superseding Indictment for lack of personal jurisdiction. This Motion is made on the grounds that the Court has the authority to, and should, grant the request for leave to appear specially to file a motion contesting service of the summons on Kolon, without waiving Kolon’s objections to the service of the summons and/or to whether this Court has personal jurisdiction over Kolon.

A Memorandum in support of the Motion is filed herewith.

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<sup>1</sup> “Kolon” refers to Kolon Industries, Inc. and any Kolon entity that the Government contends is both a party and was properly served with process in the above-captioned action. As discussed in the Motion to Quash, the Superseding Indictment is fatally ambiguous as to the named defendant(s); however, to the extent any particular Kolon entity is found to be a proper defendant, this Motion and the Motion to Quash extend to each such entity.

Respectfully submitted this 3rd day of June, 2013.

By: /s/ Rhodes B. Ritenour

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 3rd day of June, 2013, I electronically filed the foregoing document, entitled "MOTION FOR LEAVE TO ENTER LIMITED AND SPECIAL APPEARANCES ON BEHALF OF KOLON INDUSTRIES, INC.," with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to counsel named below:

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